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ROCK COUNTY SHERIFF
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April 18, 2013

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Rates for Interstate Inmate Calling Services Comment on Proposed Rule Making, FCC
12-167

The Rock County Jail agrees in principle that phone rates for inmate telephone calls should be reasonable. Inmates do better – both while incarcerated and once released – when they can remain in contact with their loved ones. At the same time, we assert that prison telephone service is not the same as service offered in the community. Any rule passed to regulate such phone call costs must take into consideration the unique nature of corrections and the important need to balance security needs and family contact. Additionally, we also believe that the current phone rates in our facility are, in fact, “reasonable”. They were the result of an open and transparent contract negotiation process where phone rates charged to our inmates were part of the criteria for awarding the winning bid.

The current inmate telecommunication system employed by the Jail provides a number of very powerful and useful tools that maintain safety within the facility and improve public safety outside of it. The cutting edge technology behind the system provides for an extremely efficient way for our facility to seamlessly share information with colleagues in other agencies. The information shared has led both to the prevention and successful prosecution of many crimes. Absent the technology our current communications system provides us, we do not believe that the crimes would have been prevented, and the prosecutions would have been much more difficult, if not impossible.

Among the many crimes that have been either prevented or successfully prosecuted include homicide, drug trafficking, and contraband being snuck into the Jail. Recently, we were able to uncover information that assisted with the prosecution of an attempted homicide in another jurisdiction. With the technology offered by our telephone system, we were able to alert law enforcement officers, and share the information that led to a successful prosecution. The ability to monitor all calls made by our inmates has led to countless drug investigations, and dramatically reduced the amount of contraband that enters our facility.

In addition, the technology to which we have access has increased the safety and security within the Jail, both for inmates and staff. For example, monitoring of phone calls has allowed us to identify inmates that are potentially suicidal and commit additional resources to them. We have reduced inmate-on-inmate and inmate-on-staff violence.

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The identity verification system offered by our telecommunication provider has also been extremely helpful. We are able to know exactly who is speaking to whom, which in turns allows us to build dynamic and powerful maps of the inmates networks.

What concerns the Rock County Jail about the proposed rate cap is that no provider of inmate telecommunication services could offer the types of technological advances and free services that have been so effective in the prevention and prosecution of crimes. Without the technologies to which we have grown accustomed, everyone involved with the Jail will suffer in some way.

We urge the Commission to avoid imposing caps on inmate call rates, or, at the very least, understand that the current revenues and technology are invaluable to providing a safe and secure environment in the Jail.